



London Borough of Harrow Council Local Plan Integrated Impact Assessment

Scoping Report Appendix C: Detailed IIA Framework

London Borough of Harrow Council

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Basis of Report

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1.0 Introduction

This appendix presents an IIA Framework in Table C.2 containing proposed IIA Objectives and Sub-objectives. The Local Plan and its alternatives will be tested against the IIA Objectives. The Sub-objectives will be used to help guide the assessment of the plan and its alternatives but may not be applicable in all circumstances. Baseline data evidence will also be referred to when using the IIA Framework to assess the Local Plan and its alternatives.

The structure of the IIA Framework has been drawn from the consultants' experience of developing assessment frameworks. The IIA objectives and sub-objectives have been developed to address the key messages from the PPP review and the Sustainability Issues, the sources of which are identified within the title of the table.

The IIA is an assessment which integrates Strategic Environmental Assessment (SEA), Sustainability Appraisal (SA), Equalities Impact Assessment (EqIA), Health Impact Assessment (HIA) and Habitats Regulations Assessment (HRA) screening. As such, the IIA framework needs to ensure that each assessment is adequately addressed, by including objectives and sub-objectives relevant to each assessment. In order to demonstrate this, Table C.1 identifies the priority IIA Objectives for each of the assessments integrated into the IIA. Indirect effects and interactions between IIA Objectives may also exist.



Table C.1: Priority IIA Objectives for Each Constituent Assessment					
IIA Objective	EQIA	HIA	HRA	SEA	SA
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	✓				✓
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	✓	✓			✓
IIA3 Accessibility :To improve local accessibility to healthcare, education, retail facilities and recreational resources (including open spaces and sports facilities)	✓	✓		✓	✓
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	✓	✓		✓	✓
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly and other vulnerable groups	✓	✓		✓	✓
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage	✓	✓		✓	✓
IIA7 Air, Light and Noise Pollution: To minimise air, light and noise pollution and ensure that future growth does not lead to the further deterioration of environmental conditions	✓	✓		✓	✓
IIA8 Minimising Contributions to Climate Change: To reduce the borough’s contribution towards the emission of climate change gases		✓		✓	✓



Table C.1: Priority IIA Objectives for Each Constituent Assessment					
IIA Objective	EQIA	HIA	HRA	SEA	SA
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability		✓		✓	✓
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats			✓	✓	✓
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings and where appropriate improve the quality of the built environment				✓	✓
IIA12 Landscape and Townscape: To conserve and enhance the borough’s landscape and townscape character				✓	✓
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources		✓		✓	✓
IIA14 Waste: To minimise waste					✓



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Proposed IIA Objective	Proposed IIA Sub-objective	Key Messages from PPP Review (identified in Table 4.1 in the main SA Report)	Sustainability Issues (identified in Sections 5 – 16 in the main SA Report)
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	<ul style="list-style-type: none"> • Encourage the creation of new businesses and business innovation • Support existing businesses to grow • Support new businesses to locate within the area and diversify the local economy • Encourage the growth of the local economy by enabling good quality economic developments, with world class infrastructure and connectivity • Support flexible working practices • Protection and retention of adequate supply of employment floor space to address business needs • Enhance the vitality and viability of Town centres, by retaining and providing additional floor space for town centre use • Safeguard existing town centres • Maintain a range of uses in town centres including retail and employment 	<ul style="list-style-type: none"> • Drive productivity and growth in the Borough’s priority areas, particularly the Harrow and Wealdstone Opportunity Area • Support economic growth and productivity, having regard to local industrial strategies and other local policies for economic development and regeneration • Promote a dynamic economy that encourages innovation • Set criteria or identify strategic sites for local and inward investment and seek to address potential barriers to investment • Allow for new and flexible working practices • The use of previously developed land and sites that are physically well-related to existing settlements should be encouraged 	<ul style="list-style-type: none"> • Around 9 out of 10 businesses in the Borough employ less than 10 staff • There is a need to support new and young businesses in the Borough to improve business survival rates • The Borough has a limited level of employment land and no capacity to provide additional land • There is reduced economic activity in Harrow town centre and Wealdstone industrial area • In 2019, the town centres with the highest vacancy rate were Burnt Oak, followed by Wealdstone, North Harrow and Rayners Lane • There is a need to attract more investment into the town centres of the Borough, particularly Harrow Town Centre in order to maintain its status as a Metropolitan Town Centre



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	<ul style="list-style-type: none"> • Improve existing shopping facilities within town centres and neighbourhood parades • Support the redevelopment / intensification of existing employment land to provide additional and high quality floor space, as well as the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area 	<ul style="list-style-type: none"> • Secure investment to deliver world class infrastructure and connectivity 	
<p>IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough</p>	<ul style="list-style-type: none"> • Create new jobs in high value sectors • Encourage developers to demonstrate how they are investing in skills and employing local people 	<ul style="list-style-type: none"> • Create jobs and prosperity • Encourage long term investment in economic capital, including infrastructure, skills and knowledge • Improve social mobility • Tackle poverty and inequality 	<ul style="list-style-type: none"> • There is a small number of large businesses in the Borough, creating vulnerability in the instance of business closures and job loss • A disproportionate impact was experienced in Harrow in relation to unemployment during the COVID-19 pandemic. The Borough experienced an increase of over 5% of residents claiming unemployment benefits. 18–24-year-olds were particularly impacted. Residents employed in low paid/skilled jobs- such as in the service industry- experienced the most unemployment • There is a need to reduce the number of unemployed residents on



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			<p>claimant benefits, and encourage them to re-enter the workforce</p> <ul style="list-style-type: none"> • In 2022, average weekly earnings were significantly higher for men in the Borough compared to women
<p>IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)</p>	<ul style="list-style-type: none"> • Ensure all residents have equitable access to local services and facilities including (taking into account the needs of an aging population): <ul style="list-style-type: none"> ○ Education facilities ○ Recreation facilities ○ Health services • Increase the delivery of new or enhanced community and health facilities • Ensure local facilities have capacity to accommodate proposed development • Increase education facility provision for children with learning disabilities • Ensure all residents have equitable access to education, community services and facilities irrespective of race, religion, sex, age, sexual orientation, disability, gender reassignment, marriage and civil partnership or pregnancy/maternity 	<ul style="list-style-type: none"> • To ensure fair and equal access to services and support irrespective of race, religion, sex, age, sexual orientation, disability, gender reassignment, marriage and civil partnership or pregnancy/maternity • Ensure an integrated approach to housing and community facilities and services 	<ul style="list-style-type: none"> • Harrow is one of the most densely populated Borough's in England • The Borough's population will continue to increase significantly, with a 4.4% increase expected by 2041 (from 2021 levels) • The Borough has an ageing population which is likely to lead to a higher number of residents with increased care needs and (when combined with the number of children in the Borough) a relatively high proportion of non-working dependents (39.2%) • The Borough has an increasing number of children and young people, with 19.5% of the Borough's residents expected to be under 15 years by 2031, increasing pressure on schools and health care facilities • The population is very diverse with a number of different religions/beliefs present • The Borough is generally not deprived although there are clusters of high deprivation to the North and



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	<ul style="list-style-type: none"> • Help ensure all children have access to a local school within reasonable walking distance • Ensure the option / policy does not have an adverse/ discriminatory impact on protected characteristics/equality groups • Ensure development is built to accessible and inclusive design standards to address the needs of a range of users, including those who are disabled elderly, families with children. 		<p>South of the Borough, as well as within the Centre. The most affluent ward is Pinner South, in the West of the Borough. Access to services and good quality housing as well as housing affordability are also contribution to deprivation.</p> <ul style="list-style-type: none"> • There is a projected shortfall of primary and secondary school places for pupils in Harrow. There is subsequently a need to expand capacity at existing and new school sites • There is a need for further provision of specialist schools and schools supporting pupils with complex learning difficulties • Crime rates within Harrow are lower than those elsewhere in London, but fear of crime remains an issue locally • There is a need to encourage safe and well-designed developments with equal accessibility to services and facilities, that cater to the needs of all ages and types of households
<p>IIA4 Health and Wellbeing:</p>	<ul style="list-style-type: none"> • Use design to create safe and attractive neighbourhoods which contribute towards quality of life and community cohesion 	<ul style="list-style-type: none"> • Planning policies should aim to achieve healthy, inclusive and safe places 	<ul style="list-style-type: none"> • Life expectancy is 7.8 years lower for men and 5.4 years lower for women in the most deprived areas of Harrow than in the least deprived areas



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<p>Enable residents to lead a healthy, good quality life</p>	<ul style="list-style-type: none"> • Ensure everyone has access to places to mix and meet such as community facilities (e.g.: community halls and places of worship) and recreation facilities • Increase and improve opportunities for active travel including walking and cycling • Increase and improve provision of open space and informal and formal recreation (e.g.: swimming pool, sports centre) facilities • Ensure everyone has access to open space to help promote healthy lifestyles • Increase provision of private amenity space • Encourage the protection of allotments and encourage the delivery of new spaces to grow food 	<ul style="list-style-type: none"> • Improve public health and wellbeing by connecting people with nature • Increase the proportion of people regularly exercising. • Promote healthier lifestyles and reduce obesity • Deliver high quality open spaces that meet the needs of local residents and are accessible to all 	<ul style="list-style-type: none"> • Obesity is a significant issue within the Borough. 8/10 children in London do not meet the daily minimum of physical activity to stay healthy • The Borough has a high prevalence of diabetes • The rate of tooth decay in young children is high • 52% of those classed as disabled in London do not have access to a car, and thus rely on public transport links • Young residents of Harrow with a disability were found to feel less safe in school/college/work, as well as when travelling, than those without a disability • The live births rate in Harrow is higher than the UK average. Over the next 10 years birth rates are expected to increase by a further 4% • The number of disabled residents, and those requiring Adult Social Care, is likely to increase with the ageing population • The number of older residents suffering with dementia and
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			<p>loneliness is likely to increase with the ageing population</p> <ul style="list-style-type: none"> • Poor air quality, particularly from PM2.5 and NO2 is contributing to premature deaths • Air Quality Focus Areas may be exacerbating inequalities related to air pollution health issues • Access to recreation sites is limited in areas of deprivation, such as the North of the Borough • More than ¼ of Harrow is classed as Areas of Deficiency suggesting access to open space in these areas, specifically in the central and Southern section of the Borough where population density is higher, is limited • There is a need to encourage more walking and cycling to encourage further physical activity in residents
<p>IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs</p>	<ul style="list-style-type: none"> • Increase the number of additional homes delivered to meet local needs/targets • Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more) 	<ul style="list-style-type: none"> • Conformity with the NPPF to use the evidence base to ensure that the Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, and is 	<ul style="list-style-type: none"> • The housing delivery target for the Borough is expected to increase from 6050 (2009-26) to 8020 (2019-29) • Housing affordability is a key issue, meaning there is a need to increase the supply of affordable housing (particularly social rented housing);



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<p>of all residents including the elderly, families with children and other vulnerable groups</p>	<ul style="list-style-type: none"> • Provide affordable homes of the tenure and size to meet the identified needs • Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care) • Increase the delivery of homes built to accessible and adaptable standards (e.g. Part M of building regulations 2010) to address the needs of a range of users/occupants; such as those with disabilities, wheel chair users and families with children • Provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites 	<p>informed by agreements with other authorities</p> <ul style="list-style-type: none"> • Ensure an adequate supply of affordable housing in line with the London Plan 2021 • Ensure that housing growth requirements are accommodated in the most sustainable way • Enable housing growth and deliver a mix of high-quality housing of varying size and tenure in order to meet local family housing needs • There is a need for a mix of housing that will be attractive to older people and those with care needs, including new mixed tenure ‘care ready’ age designated housing • Plan for the housing needs of the older population as well as young families • Ensure there is an adequate supply of adapted households, specifically wheelchair user dwellings • Ensure an adequate number of gypsy and traveller pitches 	<ul style="list-style-type: none"> • The population of the Borough is aging which is likely to lead to a higher number of residents living with increased care needs • A significant proportion of all additional homes to be delivered should consist of family housing (3 bed dwellings or larger) in order to provide for a significant increase in the number of families with children and larger sized families (such as multi generation households) that are expected to occur between 2021-41, as well as to address the existing imbalance between the excess demand for family sized housing (rise in larger sized families, families with children) compared to the supply (i.e. lack of additional larger dwellings) • Housing development must take into account the needs of those with accessibility issues (including those with disabilities and older people) and an aging population by building with accessibility in mind, to The Building Regulations (2010) standards (Part M) lifetime home standards, as well as increasing the
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			<p>provision of retirement homes and assisted living accommodation</p> <ul style="list-style-type: none"> • There is a need for a mix of housing types, sizes and tenures to be provided to meet the requirements of all areas of the community (e.g.: smaller, specialised housing for the aging population; larger family homes etc) • There is need to supply a range of different sized housing sites, as larger sites have a longer lead in time and built out rate, to maintain a stable supply and five-year land supply of deliverable sites
<p>IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.</p>	<ul style="list-style-type: none"> • Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport • Encourage intensification in existing residential areas in the most accessible locations within the Borough • Improve existing cycling and walking network and provide new routes • Increase and improve opportunities to access public transport including where there 	<ul style="list-style-type: none"> • Contribute to tackling climate change by developing and promoting low carbon travel choices • Support the move to low emission vehicles • Encourage sustainable transport and reduce the need to travel • Make the fullest possible use of public transport, walking and cycling; make cycling and walking a natural choice for shorter journeys 	<ul style="list-style-type: none"> • A backlog on road maintenance suggests that road conditions are remaining in poor condition for long periods of time, creating issues for vehicles and cyclists • The proportion of workers using sustainable transport mode to get to work can be improved There are a number of barriers to cycling in the Borough, including unsafe routes, topography, public anti-social behaviour, and concern surrounding cycle theft



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	<p>are existing issues (such as steps)</p> <ul style="list-style-type: none"> • Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure 	<ul style="list-style-type: none"> • Create places that are safe, secure and attractive which minimise the scope for conflicts between pedestrians, cyclists and vehicles • Provide an integrated, well managed and inclusive rights of way and access network • Support the expansion of electronic communications networks 	<ul style="list-style-type: none"> • Uncertain growth in private car ownership could contribute to further air pollution, and associated impacts on climate, human health and biodiversity • Harrow bus station is operating over capacity • Accessible, step-free entrances are not available at all tube stations • Increasing parking pressure in the Borough • There is a need to encourage more walking and cycling, including making improvements to safe and direct cycling routes across the Borough, taking into account the high levels of existing traffic • Accessibility to public transport is low in some areas of deprivation (.e.g. Wealdstone) and areas to the North of the Borough; creating a, significant reliance on the petrol or diesel-fuelled private car as the main mode of transport within the Borough • The London Plan seeks to direct higher levels of housing growth to the most accessible and sustainable locations of the
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			<p>Borough which it has identified as the Harrow Wealdstone Opportunity Area (including the Harrow Metropolitan and Wealdstone District Centre), followed by Edgware Major Centre, and the District and local centres across the Borough. It also suggests the intensification of existing residential areas within the most accessible locations (PTAL 3-6, 800m of a tube station, railway station and town centres such as Metropolitan centres, Major Centres and District Centres) of the Borough will play an increasingly important role towards meeting the small sites (below 0.25ha) target of 375 homes per annum</p>
<p>IIA7 Air, Light and Noise Pollution: To minimise air, light and noise pollution and ensure that future growth does not lead to the further deterioration of</p>	<ul style="list-style-type: none"> • Ensure new and existing communities are not adversely affected by poor quality air and noise pollution, either through their location or through causing a further deterioration as a result of new development • Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security 	<ul style="list-style-type: none"> • Ensure that air quality is maintained or enhanced and that emissions of air pollutants are kept to a minimum and meet agreed air quality targets and objectives • Reduce contributions to climate change by developing and promoting low-carbon travel choices 	<ul style="list-style-type: none"> • There is significant reliance on the petrol or diesel-fuelled private car as the main mode of transport within the Borough • The entire Borough is an AQMA and air pollution levels exceed objectives for healthy air quality • Air Quality Focus Areas may be exacerbating inequalities related to air pollution health issues



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environmental conditions		<ul style="list-style-type: none"> • Promotion of walking and cycling as healthy and more preferable options to car for local journeys • Minimise pollution and other adverse effects on the local and natural environment • Limit the impact of light pollution from artificial light, and noise pollution from development, on local amenity and nature conservation 	<ul style="list-style-type: none"> • There is the potential for adverse impacts on wellbeing if inappropriate new development is located near a major source of noise, including any existing or new major roads • There is a need to reduce light pollution and restrict further intensification of light pollution from new development • Noise, air and light pollution could be generated through construction works, as well as the development of new homes, in the Borough, resulting from growth proposed in the Local Plan.
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	<ul style="list-style-type: none"> • Support the delivery of renewable and low carbon energy capacity (including small scale, community energy projects and district heat networks) in line with the London Plan (2021) • Support the shift towards usage of electric and ultralow emissions vehicles • Promote a low carbon local economy • Ensure new developments are energy efficient 	<ul style="list-style-type: none"> • Reducing the need to travel and providing sustainable transport to help mitigate climate change by reducing emissions • Increase the resilience of homes and buildings • Support energy efficiency and other sustainability improvements to existing buildings • Promote low carbon economies and adopt proactive 	<ul style="list-style-type: none"> • Need to work with communities to help tackle climate change • Solar is currently the only form of renewable energy generation in the Borough • New developments will need to incorporate low-carbon and renewable energy to minimise carbon emissions • Domestic and transport emissions are the main contributors of CO₂ in the Borough



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	<ul style="list-style-type: none"> Minimise greenhouse gas emissions 	<p>strategies to mitigate carbon emissions in line with the Climate Change Act, a 100% reduction by 2050</p> <ul style="list-style-type: none"> Continue to cut greenhouse gas emissions in order to mitigate the climate emergency declared by Harrow Borough Council Support the aims of the London Plan 2021 for becoming a zero-carbon city by 2050 Provide opportunities for renewable and low carbon energy technologies 	
<p>IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability</p>	<ul style="list-style-type: none"> Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity Encourage the development of new green infrastructure which creates a connected network across the Borough and within the wider area 	<ul style="list-style-type: none"> Increase resilience to climate change impact through the location, mix and design of development Adapt to climate change e.g. considering future climate change risks when allocating development sites Manage flood risks in an appropriate way taking account of the needs of the communities and the environment 	<ul style="list-style-type: none"> It is important to become more resilient to the wider effects of climate change through adaptation measures. New developments need to minimise vulnerability and provide resilience to climate change, including implementing adaptation measures in respect of rising temperatures, water scarcity and extreme weather events, particularly heavy rainfall/flooding and heat waves



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		<ul style="list-style-type: none"> • Reduce the level of flood risk to the residents of Harrow and include natural flood management where possible which would provide additional benefits to residents compared to traditional hard engineered flood solutions • Improve flood awareness and emergency planning • Avoid development in areas of flood risk • Ensure infrastructure is located, planned, designed and maintained to be resilient to climate change • Minimise the effects of climate change • Maximise the potential of Green Infrastructure 	<ul style="list-style-type: none"> • Surface flooding is a particular issue in the Borough • Green Infrastructure presents opportunities to address multiple issues through multifunctional spaces • New development will need to incorporate sustainable drainage systems to sustainably reduce flood risk
<p>IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.</p>	<ul style="list-style-type: none"> • Avoid adverse effects on European designated habitats sites • Conserve and enhance nationally and locally designated wildlife sites • Conserve and enhance natural and semi natural habitats 	<ul style="list-style-type: none"> • Protect and enhance biodiversity, including designated sites, priority species, habitats and ecological networks • Provide accessible natural greenspace • Minimise impacts on biodiversity and provide net 	<ul style="list-style-type: none"> • There are a range of nature conservation sites within the Borough which require protection from development • There is a need to ensure that the minimum target of 10% biodiversity net gain is met



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	<ul style="list-style-type: none"> • Contribute to the delivery of new or safeguard existing BAP priority species and habitats • Achieve BNG in new developments • Contribute to creating a network of new wildlife habitats • Provide new or improved access to greenspaces • Protect sites of geological importance 	<p>gains in biodiversity in line with NPPF and the Environment Act 2021</p> <ul style="list-style-type: none"> • Need to recognise the wider benefits of ecosystem services • Biodiversity enhancement in and around development should be led by a local understanding of ecological networks • Create buffer zones around high quality habitats • Plant and manage trees, forests and woodlands so that they are fit for the future • Maximise the potential of Green Infrastructure and develop it for healthy communities and ecosystems • Aim to prevent harm to geological conservation interests • Maintain and enhance geodiversity through the management of sites, areas and wider landscapes • Support the aims of the London Plan 2021 for enriching biodiversity and geodiversity 	<ul style="list-style-type: none"> • Potential effects on European designated Habitats Sites needs to be considered • Poor condition of some existing sites is likely to continue, and in some cases, further decline • There is a need to increase resilience of nature in light of climate change. Green spaces should be joined up (green corridors), and water resources protected from damage
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<p>IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings and where appropriate improve the quality of the built environment</p>	<ul style="list-style-type: none"> • Protect and enhance heritage assets, cultural and archaeological assets and features, and their settings 	<ul style="list-style-type: none"> • Conserve and enhance, international, national and local designated heritage assets including locally significant historic buildings and heritage assets • Protect and conserve the historic environment, heritage assets and their settings • Improve the condition of heritage ‘at risk’ in the Borough • Maintain and enhance access to cultural heritage assets • Preserve and enhance Conservation Areas in Harrow Borough • Ensure development in or adjacent to Conservation Areas or Listed buildings (and their settings) respects their character and context and enhances the quality of the built environment • Ensure that any alterations or repairs to traditional buildings preserve and where possible, improve the character and appearance of the building 	<ul style="list-style-type: none"> • Heritage assets in the Borough could be negatively affected by new development which can erode the quality of the built environment and heritage features or sterilise or lead to the loss of existing heritage assets • Harrow contains 9 Archaeological Priority Areas which are protected due to evidence that historically beneficial below-ground archaeology exists • There are 909 locally listed buildings within Harrow, which are of importance due to the local interest and the positive contribution that they make to the townscape • There are 19 assets on the heritage at risk register generally due to slow decay and some localised problems • The protection of the Borough’s cultural heritage remains a significant issue for many local residents, businesses and community groups
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		<ul style="list-style-type: none"> Promote the use of sustainable materials Protect the historic environment for the benefit of our own and future generations Maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it 	
<p>IIA12 Landscape and Townscape: To conserve and enhance the borough’s landscape and townscape character</p>	<ul style="list-style-type: none"> Respect and protect existing landscape and townscape character Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact Protect sensitive areas and protected views Safeguard landscape and townscape features such as trees Encourage well-designed developments which enhance local character 	<ul style="list-style-type: none"> Protect and enhance valued landscapes, biological and geological conservation interests and soils. Harrow on the Hill and Harrow Ridge Weald are considered as the most important landscape features in Harrow Recognise the wider benefits from natural capital and ecosystem services Seek to promote or reinforce local distinctiveness Recover nature and enhance the beauty of landscapes Maintain and enhance the overall quality and diversity of landscape character across the Borough 	<ul style="list-style-type: none"> 21.5% of the Borough is protected as Green Belt. If not managed correctly, the pressure of housing and transport development, as well as waste disposal and mineral extraction, may reduce this. 6.2% of the Borough is protected as Metropolitan Open Land. Development for housing and economic sites are partially restricted due to the presence of Protected Views, and the RAF Northolt Safeguarding Zone. Identified landscape character issues within the natural environment of Harrow include a lack of traditional habitat management (for woodlands, grasslands, heathlands and water bodies such as ponds), as well as a



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		<ul style="list-style-type: none"> • Seek to protect Green Belt and Metropolitan Open Land across the Borough • Maximise the potential of Green Infrastructure • Promote connectivity between residents and open spaces through the Harrow Green Grid • There are major economic benefits to be gained from natural capital and their value should be considered and incorporated into decision-making in relation to land use 	<p>lack of public access in many areas. Landscape character issues within the built environmental of Harrow include neglected buildings, lack of security, and visual pollution.</p> <ul style="list-style-type: none"> • There are 29 spaces designated as Conservation Areas in Harrow. Conservation Areas have been designated by the Borough Council to protect the character of many settlements and restrict inappropriate development. • A number of Conservation Area character statements highlight that pressure for new development has historically had a negative impact on some of the Borough’s archaeological or cultural heritage. In particular, it is noted that some modern and suburban homes and economic development built close to traditional properties has affected local character. • The protection of the Borough’s cultural heritage remains a significant issue for many local residents, businesses and community groups.
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Table C.2: Detailed IIA Framework

<p>IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources</p>	<ul style="list-style-type: none"> • Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored • Avoid development of greenfield land • Promote the efficient use of minerals • Protect soil quality and avoid soil pollution • Ensure surface and groundwater water resources are used efficiently and protected from pollution 	<ul style="list-style-type: none"> • Promote sustainable use of water as a natural resource • Improve water efficiency • Promote sustainable and water efficient development • Ensure that water quality is improved or maintained where possible • Prevent pollution of groundwater • Minimise the amount of water lost through leakage each year • Ensure delivery of adequate water and wastewater infrastructure • Meet national and localised water quality and wastewater targets • Create and nurture high value wildlife waterway habitats and contribute to minimising the impact of climate change • Remediate land contamination • Protect soil quality and avoid soil pollution • Encourage the use of previously developed (brownfield) land 	<ul style="list-style-type: none"> • None of the waterbodies within the Borough are currently achieving 'good' overall status, and all waterbodies received an overall 'fail' with regard to their chemical status and a moderate ecological status and there is a need to improve water quality. • Changes to population will put additional strain on already stressed water resources. Residents currently use more water per day than the London average • New development should incorporate measures to ensure that water is used efficiently, to help reduce the water demand of the Borough particularly in light of future climate change • There is a need to consider the effect of development on groundwater supplies both now and in the future • SUDs can promote infiltration of surface water into the ground and recharge aquifers, and can therefore play a long-term role in safeguarding and sustaining water resources
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Table C.2: Detailed IIA Framework

		<ul style="list-style-type: none"> • Effective soil protection during construction • Sustainable management of soils • Promote the efficient supply and use of minerals 	
<p>IIA14 Waste: To minimise waste.</p>	<ul style="list-style-type: none"> • Encourage new developments to provide adequate space for waste separation • Encourage the repurposing and refurbishing of buildings, instead of demolition • Safeguard existing waste management sites • Where demolition needs to occur, ensure waste is recycled (preferably on site) 	<ul style="list-style-type: none"> • Ensure the design and layout of new development supports sustainable waste management • Encourage and support with Circular Economy where possible • Waste should be managed in line with the waste hierarchy: <ul style="list-style-type: none"> • Prevent or reduce waste • Reuse • Recycle • Other recovery methods • Dispose • Meet national, regional and localised waste targets including those on landfill, reuse and recycling • Safeguard existing waste management sites • To provide protection to the local environment and residents, whilst ensuring the 	<ul style="list-style-type: none"> • There is a need to follow the waste hierarchy • Recycling and household waste in the Borough must be collected separately • Less than two fifths of waste is recycled, reused, or composted within the Borough. As a result, the Borough falls within the lowest quartile for recycling in England • There is a safeguarded household waste disposal site located within the Borough located next to residential dwellings, religious and education facilities, and a train line • In order to support the circular economy targets in the London Plan (2021) new developments need to ensure that there is adequate space for waste separation. • To support the waste hierarchy, buildings should be repurposed,



Table C.2: Detailed IIA Framework

		provision of waste management facilities in accordance with Government policy and society's needs	and demolition waste should be recycled where possible
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